

SHER TREMONTE LLP

September 29, 2020

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

So ordered.

/s/ Alvin K. Hellerstein
10/1/2020

Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

Dear Judge Hellerstein:

Our firm has been retained to represent Jona Rechnitz, the defendant in the above-referenced action, in connection with the ongoing restitution issues in this case. We are entering notices of appearance today. We are aware that the Court has previously set a briefing schedule on the motion for restitution by the New York Correctional Officers' Benevolent Association ("COBA") pursuant to the Crime Victims' Rights Act, and that Mr. Rechnitz is due to respond to COBA's motion by October 6, 2020. We plan to work diligently and swiftly to investigate the matter and provide information to the Court that will be relevant to Your Honor's "assessment of Rechnitz's culpability and financial condition." Order Regulating Proceedings, dated July 31, 2020, *United States v. Rechnitz*, No. 16 Cr. 389 (AKH), ECF No. 93 (internal quotation marks omitted). In order to do so, however, and ensure that the Court receives complete and accurate information, we require additional time to conduct such investigation. Accordingly, we respectfully request a 30-day adjournment of the October 6 deadline to file our responsive brief. This is our first request for an extension of time. We have conferred with counsel for COBA, who advises that COBA does not consent to the requested adjournment.

Respectfully submitted,

/s/ _____
Michael Tremonte
Noam Biale

Cc: All counsel of record (by ECF)